

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ANDRE LUIS GONZALEZ, Individually  
and On Behalf of All Others Similarly  
Situated,

Plaintiff,

v.

NEOVASC INC., FRED COLEN, and  
CHRISTOPHER CLARK,

Defendants.

Case No. 7:20-cv-09313-PMH

DECLARATION OF JEREMY A.  
LIEBERMAN IN SUPPORT OF MOTION  
OF PRATAP GOLLA FOR  
CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFF, AND APPROVAL OF  
CO-LEAD COUNSEL

DANIEL SIPLE, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

NEOVASC INC., FRED COLEN, and  
CHRISTOPHER CLARK,

Defendants.

Case No. 1:20-cv-09948-PMH

I, Jeremy A. Lieberman, hereby declare as follows:

1. I am an attorney with Pomerantz LLP (“Pomerantz”), counsel on behalf of Pratap Golla (“Golla”), and have personal knowledge of the facts set forth herein. I make this Declaration in support of Golla’s motion for consolidation of the above-captioned related actions (the “Related Actions”), appointment as Lead Plaintiff for the Class, and approval of his selection of Pomerantz and Holzer & Holzer LLC (“Holzer”) as Co-Lead Counsel for the Class.

2. Attached hereto as the exhibits indicated are true and correct copies of the following:

Exhibit A: Chart reflecting Golla’s financial interest in the Related Actions;

Exhibit B: Press release published over *Business Wire*, announcing the pendency of the first-filed of the Related Actions;

Exhibit C: Shareholder Certification executed by Golla;

Exhibit D: Declaration executed by Golla; and

Exhibit E: Firm resume of Pomerantz.

Exhibit F: Firm resume of Holzer

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed on January 5, 2021, at New York, New York.

/s/ Jeremy A. Lieberman  
Jeremy A. Lieberman